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Response to

Driver and Vehicle Standards Agency
Consultation Paper

“Improving Moped and
Motorcycle Training”

15 February 2017



Response to Improving Moped and Motorcycle Training

Introduction

This is RoSPA's response to the Driver and Vehicle Standards Agency's consultation paper, "Improving Moped and Motorcycle Training". It has been produced following consultation with RoSPA's National Road Safety Committee.

Motorcyclists account for 21% of deaths on the road, despite forming only 1% of vehicle traffic. In 2015, 365 motorcyclists were killed, 5,042 seriously injured and there were 19,918 motorcyclist casualties in total. The Government believes that the risks motorcyclists face on the road could be reduced by more realistic and individually tailored training, delivered by better qualified instructors.

Learner motorcyclists must complete a Certificate of Basic Training (CBT) course before being allowed to ride on the road. Having passed their CBT, they may ride a moped or a small (A1) motorcycle unaccompanied on the road (not motorways) while displaying L plates. The CBT certificate is valid for 2 years and learners who do not pass a motorcycle test within this two year period they must take another CBT course if they wish to continue to ride a motorcycle.

Riders aged 24 years and over wishing to ride a larger more powerful machine must pass an additional theory and practical test, known as direct access scheme (DAS). Younger motorcyclists can progress in stages to the highest category of machine by passing a test on a lower category motorcycle and after two years' of riding experience, complete another practical test on a larger motorcycle (known as progressive access).

Motorcycle training is provided by Approved Training Bodies (ATBs), who are authorised to provide approved CBT and DAS training courses. They are responsible the instructors who are registered to provide training for them. There are three levels of instructor qualification:

- Down-trained CBT instructors have been trained and authorised by an ATB to conduct CBT courses on mopeds or light (A1) motorcycles and are only able to train for the ATB that certified them
- Certified CBT instructors have passed the CBT instructor assessment carried out by the DVSA and are qualified to deliver CBT on mopeds or light (A1) motorcycles, and to down-train other instructors
- DAS instructors have passed the CBT instructor assessment above and an assessment to qualify as a DAS instructor; they may provide training on all categories of motorcycle, A1, A2 and unrestricted category A.

All CBT instructors undergo a standards check by DVSA examiners at least once during their four year period of registration as an instructor. The DVSA also conduct unannounced quality assurance visits on an intelligence driven approach.

The DVSA is seeking views on its proposals to:

- Update the qualification arrangements for motorcycle instructors by amalgamating the CBT/DAS trainer qualification into one assessment, requiring down-trained instructors to successfully complete an assessment course within a specified period of time and introducing a new assessment for instructors who wish to down-train other instructors.
- Update the CBT syllabus to reflect the national standard for riding mopeds and motorcycles, and to combine the current five modules to four.



Response to Improving Moped and Motorcycle Training

- Strengthen and expand the quality assurance regime for motorcycle instructors.
- Introduce an option to allow riders who have passed a practical motorcycle test to upgrade their licence entitlement so they can ride larger motorcycles by completing an approved training course rather than take additional practical test.
- Restrict provisional licence holders to automatic motorcycles when CBT is undertaken on an automatic model.
- Revoke CBT certificates that have been issued to a provisional licence holder who has accrued six or more penalty points within two years of the CBT certificate being granted.
- Explore options to move the administration of CBT from its current paper-based system to a digital platform.
- Explore the benefits and impacts of novice riders taking a theory test prior to, or as part of, their CBT course.
- Consider the benefits of an 'earned recognition' scheme to recognise the ATBs whose instructors achieve consistently high standards.



Response to Improving Moped and Motorcycle Training

Question 1

Do you agree that we should implement a new combined CBT/DAS instructor qualification assessment?

RoSPA Response

RoSPA agrees that many of the skills required to teach CBT are relevant to teaching people to ride larger motorcycles. Therefore, in principle, we agree that combining the CBT and DAS instructor assessments into a single combined assessment so instructors can train on all categories of motorcycle, makes sense. However, the consultation paper provides few details on the content and format of the combined instructor assessment. For example, will potential instructors be able to take the combined course on a small motorcycle (or even a moped) or will they have to take it on a large machine?

However, RoSPA believes that there should be separate assessments for trainers who only train trainees, and trainers who also down-train other instructors because these are different types of training that require different training skills and courses:

- Training a trainee requires the ability to train someone to meet the required CBT standard and to properly assess whether or not they have done so.
- Training an instructor involves training someone to train another person to meet the required CBT standard and assessing their ability to deliver this training and to properly assess whether or not their trainees have met the required CBT standard.

Question 2

Do you agree that down-trained instructors should have a limited period giving instruction before being required to undertake a qualification assessment? If so how long should this period be?

RoSPA Response

Yes, RoSPA agrees that down-trained trainers should have a limited period giving instruction before being required to undertake a qualification assessment. This would help to ensure that such trainers do not remain down-trained trainers permanently but progress on to become fully qualified CBT certified instructors by passing the DVSA's assessment process.

We have no specific evidence on which to base a suggestion for the length of the limited period. However, we believe that the current registration period of four years for down-trained instructors to be able to offer CBT instruction is too long. One option would be to set the period as two years, which would match the validity period of CBT certificates.

Question 3

Do you have any additional ideas or suggestions on how we could improve CBT/DAS instructor qualifications?

RoSPA Response

RoSPA has no further comments at this stage.



Response to Improving Moped and Motorcycle Training

Question 4

Do you agree that we should make changes to the CBT syllabus?

RoSPA Response

Yes, RoSPA agrees that changes should be made to the CBT syllabus. It should be updated to reflect the national standard for riding mopeds and motorcycles, which sets out what riders must be able to do and know and understand to be a safe and responsible moped or motorcycle rider. Requiring trainees to 'know and understand' rather than to 'be taught' the different parts of the CBT syllabus should provide a more client centred approach to learning.

Question 5

Do you agree that the 5 elements of CBT should be condensed to 4?

RoSPA Response

RoSPA agrees that merging the B 'practical on-site training' and C 'practical on-site riding' course elements of the CBT syllabus makes sense as it would enable a more flexible approach to the on-site aspect of delivering the training.

Question 6

Do you agree that instructors should ensure trainees are appropriately dressed for CBT?

RoSPA Response

Yes, RoSPA agrees that instructors should be required to ensure trainees are appropriately dressed for CBT. The importance of having the right equipment and clothing is one of the modules in CBT, and candidates for the practical motorcycle test must wear suitable clothing otherwise their test will not go ahead. Therefore, it is entirely sensible to require suitable clothing during CBT training. We understand that many ATBs provide basic clothing and equipment as part of their course arrangements.

Question 7

Do you have any additional ideas or suggestions on how we could improve the CBT syllabus?

RoSPA Response

RoSPA has no further comments at this stage.

Question 8

Do you agree to the introduction of mandatory standards checks?

RoSPA Response

Yes, RoSPA supports the introduction of mandatory standards checks. In fact, we see this as an essential and crucial aspect of the whole process of improving moped and motorcycle training in order to ensure that training meets the required standards and those standards are maintained. The standards check should be closely aligned with the National Rider Trainer Standard.



Response to Improving Moped and Motorcycle Training

The DVSA already conducts quality assurance and compliance checks on instructors delivering CBT courses. Expanding this to include all instructors who provide road based motorcycle instruction is very important, especially if the CBT and DAS instructor qualification courses are combined (as discussed in question 1) and if the proposal to allow riders to upgrade their motorcycle licence entitlements by taking a training course, rather than an independent test, (as discussed in question 11) are implemented.

We agree that if an instructor fails a standards check they should have up to two more attempts to reach the required standard, and if they fail to reach the required standard their authorisation to deliver motorcycle training courses should be withdrawn. If an instructor fails a standards check for very poor performance, of unsafe practice, immediate withdrawal of their authorisation should be considered.

Question 9

Do you agree that all types of instruction should be subject to mandatory quality assurance?

RoSPA Response

Yes, RoSPA agrees that all types of instruction should be subject to mandatory quality assurance for the reasons outlined in our answer to question 8 above.

Question 10

Do you have any suggestions on how we could improve standards checks for instructors overall?

RoSPA Response

RoSPA has no further comments at this stage.

Question 11

Do you agree that DVSA should explore setting up a training option to upgrade motorcycle licence entitlements?

RoSPA Response

RoSPA recognises that the motorcycle industry strongly supports the introduction of a training option to allow motorcyclists to ride larger motorcycles without needing to take a further test. RoSPA does not oppose the DVSA exploring such a training option, however, we believe that it is crucial that any such arrangements incorporate robust quality assurance measures.

Currently motorcyclists who wish to upgrade their licence entitlement so they can ride larger machines must pass an additional test via the Direct Access or Progressive Access Schemes. This requirement to take a practical motorcycling test on the larger machine, independent of their training provider, provides an important quality check of their ability to do so.

Removing this quality check should only be considered if the DVSA are confident that the quality assurance measures are sufficiently robust.



Response to Improving Moped and Motorcycle Training

Question 12

How do you see a training option working in practice?

RoSPA Response

RoSPA would like to see a statutory register of motorcyclist instructors (similar to the one for car driving instructors) to ensure instructors are trained, tested and monitored to minimum, national standards.

Question 13

Do you agree that learners who complete their CBT course on a machine with automatic transmission, should be restricted to riding an automatic machine?

RoSPA Response

Yes, RoSPA agrees that riders who complete a CBT course on an automatic motorcycle or moped should be restricted to riding automatic machines only. Allowing a new rider to ride a manual motorcycle on the road when they have only taken CBT training on an automatic motorcycle means they may not have gained the necessary control skills or experience of riding with manual gears. This increases the risk of them crashing on a manual motorcycle due to poor vehicle control.

Question 14

How should learner riders with an automatic restriction on their CBT certificate be able to upgrade their entitlement to ride a manual machine?

RoSPA Response

To ride a manual motorcycle they should be required to take an 'upgrade' training session, or another CBT course, on a motorcycle with manual gears.

Until such time that regulations are amended to implement this change, the DVSA could produce separate CBT certificates for riders who complete CBT on an automatic machine, and they, and CBT training providers, could recommend to such trainees that they only ride automatics or take further training if they intend to ride a geared motorcycle.

Question 15

Do you consider that the Secretary of State should have powers to revoke a CBT certificate if the learner rider accrues 6 or more penalty points?

RoSPA Response

Yes, RoSPA believes that learner riders who accrue six or more penalty points should have their CBT certificates revoked. This would mirror the situation that applies to motorcyclists who have passed the motorcycle test, and to new car drivers, whose driving licence is revoked if they accrue six or more penalty points within two years of gaining their full driving licence, and act as an incentive to ride safely. Research suggests that the New Drivers Act is having a beneficial effect on new drivers' offending patterns.



Response to Improving Moped and Motorcycle Training

Question 16

Should DVSA consider other measures for learner riders who have accrued 6 penalty points?

RoSPA Response

The DVSA should have the power to revoke CBT certificates that have been issued fraudulently, even if the rider was not aware that it had been issued fraudulently.

Question 17

Do you agree that the CBT administration process should be on a digital platform?

RoSPA Response

RoSPA agrees that the CBT administration process should be available on a digital platform. However, individuals who are not able to use digital services should still be able to access these services through the more traditional routes of telephone and post.

Question 18

Do you think that learner riders should take a theory test as part of or prior to CBT? If yes what format do you consider the theory test should take?

RoSPA Response

In principle, RoSPA thinks that learner riders should take a theory test as part of, or before, their CBT course. As the consultation paper notes, research suggest that there is a disconnect between the level of theory knowledge claimed by learner riders and the level their instructors believe they actually have.

However, as RoSPA does not provide CBT training, we not sure how the requirement for learner riders to pass a theory test would work in practice nor the logistical problems ATBs would need to overcome to provide the test.

Question 19

What other measures do you think DVSA could put in place to educate new riders?

RoSPA Response

It may be helpful if CBT guidance and promotional materials made it clear that CBT is not automatically a one-day course, and that some riders may need longer in order to reach the required standard. It should explain that two hours of on-road training is only the minimum requirement, and that many riders will receive more than this. This message should also be clearly provided by trainers to anyone who enquires about taking CBT and in pre-course briefings. The reasons for, and benefits of, a longer on-road element in a CBT course should be stressed. This may help to set more realistic expectations among both trainers and trainees.

The DVSA should work closely with motorcycle trainers and the many other organisations that provide public advice and information about motorcycling issues to ensure that they all deliver consistent messages through their varied communication channels. Advice and information should be targeted at riders and other people (such as parents) who can influence them.



Response to Improving Moped and Motorcycle Training

Question 20

Do you agree with the principle of earned recognition?

RoSPA Response

Yes, RoSPA agrees with the principle of earned recognition. It is a way of rewarding, and hence encouraging, higher standards.

Question 21

What evidence do you consider that instructors should provide to gain earned recognition?

RoSPA Response

RoSPA suggests that the evidence required to meet 'earned recognition' status include:

- A client-centred training approach
- Trainers and training that meets the National Standard for Driver and Rider Training
- Assessment of trainees' needs at the start of a CBT course
- Assessment of trainees' competence in the on-road riding element
- Effective internal administration and management processes, including risk assessments and risk management
- Qualifications of trainers
- Standards check for trainers
- Adoption of CPD process

RoSPA Response

Question 22

What benefits do you feel DVSA could offer to encourage instructors to gain earned recognition?

RoSPA Response

The DVSA could help to promote Approved Training Bodies who have gained 'earned recognition' status in a similar way to how they promote professional driving instructors who abide by the ADI Code of Practice and the DVSA's Continuing Professional Development (CPD) scheme. This would help such ATBs to promote themselves and help people who are looking for a CBT trainer to identify those who provide a good service.

RoSPA would be happy to recommend that anyone searching for a CBT provider give preference to those that have 'earned recognition' status.

RoSPA thanks the Driver and Vehicle Standards Agency for the opportunity to comment on the proposals. We have no objection to our response being reproduced or attributed.





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